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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

**SEIKO EPSON CORP
AND EPSON AMERICA,**

Plaintiffs,

v.

Inksystem LLC, et.al.

Defendants.

Case No.: 3:16-cv-00524-RCJ-VPC

**MOTION TO WITHDRAW AMOUNT OF
MONEY GRANTED BY THE
PRELIMINARY INJUNCTION ECF 159.**

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21 Pursuant LR 7-2 Defendant Koshkalda file this motion.

22 **A. BACKGROUND.**

23 On August 7, 2017, the Court granted Plaintiffs Seiko Epson Corporation and Epson
24 America, Inc (collectively “Plaintiffs”) motion for a preliminary injunction order for asset
25 seizure and impoundment and order show cause regarding issuance of pre-judgement asset
26 seizure pursuant to the Lanham Act (15 U.S.C. §1051 et.seq.), and Federal Rules of Civil
27 Procedure, Rule 65 (“Motion”), against Defendant’s AF LLC, ART LLC, Inkredible llc LLC,
28 Andriy Kravchuk, Igor Bielov, Artem Koshkalda, Vitalii Maliuk (collectively Defendants). ECF
29 159.

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31 **B. ARGUMENTS.**

32 Preliminary Injunction ECF 159 permits Defendants to withdraw up to \$3000 per month
33 per Defendant for business, living and legal expenses. Defendants multiple times submitted
34 motions with declarations stated that they could not withdraw money from their frozen bank

1 accounts neither corporate nor personal because the way the preliminary injunction order was
2 drafted the bank official said it prevented them from permitting the withdrawal of any money at
3 all. All of Defendant's motions were denied. Since Preliminary Injunction was granted on
4 August 7, 2017 the Defendant Koshkalda has not been able to withdraw from his Bank account
5 the permitted amount of money for August equal to \$3000 as Injunction Order permitted him to
6 do. Defendant Koshkalda, therefore, respectfully requests this honorable court issue an order to
7 telling the bank that the Injunction Order permits Defendant Koshkalda to withdraw \$3000 for
8 the month of August.

9 **C. CONCLUSION.**

10 Based on the abovementioned facts the Defendant asks the Court to issue an order which
11 will instruct the Bank of America that notwithstanding the bank's interpretation of the Injunction
12 Order, Defendant Artem Koshkalda is permitted to withdraw \$3000 for the month of August,
13 2017 from bank account *****0519.

14
15 DATED on October 26, 2017.

16
17 Defendant hereby sign this motion under penalty of perjury under the laws of the United
18 States:

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20 **Artem Koshkalda**

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CERTIFICATE OF SERVICE

I hereby certify that I am co- Defendant and that on October 26, 2017, I served a full, true and correct copy of the foregoing **MOTION TO WITHDRAW AMOUNT OF MONEY GRANTED BY THE PRELIMINARY INJUNCTION ECF 159.**

via the United States District Court's CM/ECF filing system upon the following:

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